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Attorney for The McClatchy Company

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENERAL MOTORS CORP., et al.,  
  
Debtors.

Chapter 11

Case No. 09-50026  
(Jointly Administered)

Honorable Robert E. Gerber

**NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE**

**PLEASE TAKE NOTICE** that The McClatchy Company, a creditor and party in interest under Federal Rules of Bankruptcy Procedure 2002 and 9007, requests that all notices given or required to be given and all papers served or required to be served in these cases be given to and served on:

Paul J. Pascuzzi  
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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, pursuant to Federal Rule of Bankruptcy Procedure 3017, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statement of affairs, operating reports, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights

or interest of any creditor or party in interest in this case, including The McClatchy Company with respect to (a) the debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by The McClatchy Company.

**PLEASE TAKE FURTHER NOTICE** that The McClatchy Company intends that neither this Request for Special Notice, pleading, claim or suit shall waive (1) the right of The McClatchy Company to have final orders in noncore matters entered only after de novo review by a District Judge; (2) the right of The McClatchy Company to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) the right of The McClatchy Company to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which The McClatchy Company is or may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments The McClatchy Company expressly preserves and asserts in this case.

Dated: June 8, 2009

FELDERSTEIN FITZGERALD  
WILLOUGHBY & PASCUZZI LLP

By: /s/ Paul J. Pascuzzi  
PAUL J. PASCUZZI,  
Attorney for The McClatchy Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of June, 2009, a copy of the foregoing  
**NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE** was sent to those  
receiving documents via the CM/ECF system and sent by first class mail, postage prepaid, to:

***Debtor***

General Motors Corporation  
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/s/ Gianna S. Lee  
Gianna S. Lee